

With respect to the Amateur Radio Service restructuring proposals currently before the Commission, I wish to support those of the American Radio Relay League, RM-10867 and RM-10413, although with three specific misgivings.

On balance, the proposals submitted by the ARRL are within the best interests of the amateur service. My recommendations would differ in two respects, however.

First, I am strongly opposed to the automatic “grandfathering” of Technician class licensees (with or without Morse Code) to General class. This is too significant a jump in privileges for such a maneuver. Today’s Technician-class and yesterday’s Novice-class licenses were the entry points to the Amateur Radio Service. So it should continue with the proposed new Novice-class. Those who hold current Technician and Technician with Morse licenses would still gain HF telephony privileges under the new proposed Novice-class license. Thus there is no purpose to upgrading even further to what is logically the next step for entry level licensees.

Additionally, today’s Technician license examination does not require sufficient technical knowledge commensurate with the General privileges, which they would be granted under this proposal. Therefore, I would propose the Technician-class, Technician-class with Morse code and the new Novice be consolidated into one class—the Novice. General-class would remain untouched. I see no problem with consolidating Advanced-class and Amateur Extra-class into one top-level license class.

My second concern is with respect to the question and answer pool for all examination classes. I am vehemently opposed to continuing the current practice of releasing the full question and answer pools publicly. While I do not think it’s necessary or prudent to demand that candidates should submit subjective essay-type responses, I firmly believe that a greater level of knowledge and understanding of the subject matter at all levels would be attained if the candidates were required to prepare for the examination by doing something other than rote memorization of correct answers, as, regrettably, is frequently the case. It is this author’s belief that a syllabus for each level should be published but then leave it up to the candidate to learn the material from third-party study resources in preparation for the examination. Any other course of action degrades the integrity of the entire examination process. The current practice should be abandoned forthwith.

My final concern is that which is currently most polarizing within the Amateur Radio community. Knowledge of the International Morse Code. With last year’s WRC-03 changes and many world nations having decided to drop the Morse requirement, I believe it is within the best interests of the service and the Commission to do away with the Morse element completely, for all levels of licenses, since knowledge of the Morse Code is no longer required for any other service, including Maritime.

Retentionists argue in favor of the viability of “CW” in situations of dire emergency. Yet, following the tragic events of September 11<sup>th</sup>, 2001 in New York and Washington, and the power outage of August 15, 2003, no lives, to this author’s awareness, were dependant upon knowledge of the International Morse Code. By all means, an understanding of Morse should be nurtured in all licensees, but it should not be mandated by government decree—rather by active choice of the individual licensee. It should not be the position of the Commission to mandate or favor one operating mode over others. License class must dictate bandwidth of emissions, upper and lower frequency limits and all permitted operating modes, but anything further than that must be left to individual tastes, preferences and limitations.

I make these comments from the point of view of an Amateur Extra-class operator with 5 WPM code in the United States and an Advanced Amateur class license from Canada, for which I was examined at 15 WPM, transmit and receive, with a three-minute perfect-copy requirement in 1981. I presently operate CW, SSB, PSK-31, MFSK-16, FSK/AFSK, SSTV, AM and FM modes on most bands between 80 meters and 70 centimeters.

Respectfully submitted,  
Peter Dougherty,  
W2IRT